

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

CASEY MULLINS

\*

Plaintiffs

\*

v.

\*

Case No: WDQ-02-CV-1634

BALTIMORE CITY MARYLAND, et al. \*

Defendants

\*

\* \* \* \* \*

CONSENT MOTION TO EXTEND DISCOVERY AND TO MODIFY THE  
SCHEDULING ORDER

Officer Jan Rollon, a defendant in the above referenced case, by and through his undersigned counsel, pursuant to Rule 16(b) of the F.R.Civ.P., files this Consent Motion to Extend Discovery and to Modify the Scheduling Order, and in support of said Motion, states and avers as follows:

1. Defense counsel was assigned to handle the legal representation of defendant Officer Jan Rollon by the Baltimore Police Department on Friday, January 23, 2004.

2. Defense counsel noted his appearance and filed an Answer for the Defendant in the case contemporaneously with the filing of this Motion.

3. Defendant has not had the opportunity to participate in the discovery in the case.

4. Defense counsel needs to modify the scheduling order by extending the discovery deadline so that he will have adequate time to review the files, familiarize himself with the case, conduct and complete a full range of discovery, and prepare a defense for Defendant.

5. It is reasonable to expect that it will take Defense counsel 120 days to complete those tasks.

6. Plaintiffs' counsel consents to this Motion.

WHEREFORE, Defendant Officer Jan Rollon respectfully prays that this Honorable Court will grant the Consent Motion to Extend Discovery and to Modify the Scheduling Order and enter the proposed order that is attached to this Motion.

Respectfully submitted,

/s/ Neal M. Janey

Neal M. Janey

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 27<sup>th</sup> day of January 2004, a true copy of the foregoing Consent Motion to Extend Discovery and to Modify the Scheduling Order was filed, and if necessary, hard copies will be mailed, in accordance with the Electric Filing Requirements and Procedures of the United States District Court for the District of Maryland.

/s/ Neal M. Janey  
Neal M. Janey

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ORDER

Upon consideration of the foregoing Consent Motion to Extend Discovery and to Modify the Scheduling Order filed by the Defendant, Officer Jan Rollon, it is on this \_\_\_\_\_ day of \_\_\_\_\_ 2004, ORDERED:

1. That discovery shall be completed by May 31, 2004, at which time the parties shall file a status report;

2. That all motions (except for motions in limine) shall be filed by June 30, 2004 and,

3. That the pre-trial conference shall be rescheduled for a date and time convenient to this Honorable Court.

\_\_\_\_\_  
Honorable William D. Quarles, Jr.  
United States District Judge